

# EXHIBIT G



# CERTIFICATE OF ACCURACY

I certify that the Declaration of Jesus Lopez Paez was translated into English by a translator and editor working for Multilingual Connections who are both competent and qualified to perform translation into this language. I attest that the final target file is an accurate and complete translation of the original Spanish version.

A handwritten signature in black ink, appearing to read "Kara Davis", is written over a horizontal line.

Kara Davis  
Team Lead and Contract Manager  
Multilingual Connections, LLC

9/20/18  
Date



Multilingual Connections, LLC #255450

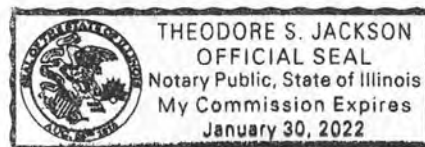
Subscribed and sworn to before me on

Thursday, September 20, 2018, in

Evanston, County of Cook, State of Illinois.

Notary Public

A handwritten signature in black ink, appearing to read "Theodore S. Jackson", is written over a horizontal line.



The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,

Plaintiff

v.

THE GEO GROUP, INC.,

Defendant

CIVIL ACTION No.  
3:17-cv-05806-RJB

DECLARATION OF  
JESUS LOPEZ PAEZ

I, Jesús López Páez, declare the following:

- 1- I am over eighteen years of age, have personal knowledge of and am competent to testify on the issues contained herein.
- 2- I have been in the Northwest Detention Center (NWDC) since September 26, 2017.
- 3- I began working in the Voluntary Work Program in November 2017 and I have been working continuously since then in a variety of jobs.
- 4- I decided to work because I needed money to stay in touch with my family and make phone calls to my wife and children, as well as to buy things from the commissary. GEO calls the work program “voluntary”, but I really have no choice but to work for \$1/day because I need the money and there is no other way to earn it.

- 1 5- In the commissary, I buy food to eat, including noodles, chicken breast  
2 and soft drinks. Sometimes I buy food in the commissary because I am  
3 hungry. Other times, I buy food to have some variation in my diet.
- 4 6- When I first arrived at the NWDC, I was assigned to live in Pod C-2. I  
5 became aware that I could get a job when a GEO guard asked me if I  
6 wanted to work in the pod. I said "yes," and he placed me on the waitlist.  
7 I was called to work when someone else quit their job, since I was the  
8 next person on the list.
- 9 7- Before I was allowed to work, I was given a form that said something  
10 about the fact that the work was voluntary and that I would be paid  
11 \$1/day. I did not have time to read everything that was on the paper. I was  
12 required to sign it, or initial it, before starting to work, and that is what I  
13 did.
- 14 8- My first job was that of bathroom and shower cleaner. I did this job for a  
15 couple of months. I did not receive training, but they told me to ask the  
16 person who had been doing the work before me so that I would know  
17 what to do.
- 18 9- There were 4-5 showers that I had to clean every day. Sometimes the  
19 GEO guards also asked me to clean the bathrooms, including the 4 toilets.  
20 Normally, cleaning the showers and cleaning the bathrooms are separate  
21 tasks and two people would do the work each shift. When I did both jobs  
22 in one day, I would work for more hours and I would still be paid only \$1  
23 /day.
- 24 10- GEO gave us a spray bottle, buckets, bleach, gloves, mops and a rubber  
25 squeegee.  
26

11- There were three shifts for the bathroom and shower cleaners: the morning shift at 11 a.m., the afternoon shift at [*handwritten: 4:20 p.m. JLP*] and the night shift at 9:30 p.m. I was assigned to the 11:00 a.m. shift. The work took about 30 to 40 minutes to complete. Every day, the GEO officer on duty told me what to do and how to do it, which showers needed more cleaning and if I had to clean the toilets as well.

12- On more than five occasions, I had to work all three shifts when no other detainee wanted to do those jobs. I agreed to do it because I wanted us to have clean bathrooms, and if I did not do it, no one else would. I was also worried that I would lose my job if I said no. Even though I was working three shifts, I still got paid only \$1/day.

13- I became tired of working double or triple shifts cleaning the showers and bathrooms. I told the GEO guard that even though I did want to work, I did not want to work multiple jobs anymore. The GEO guard on the morning shift fired me from my position of shower cleaner and told me that there was someone else willing to do the job if I didn't want to do it.

14- I told the guard assigned to the afternoon shift that I wanted to work and that I needed to be assigned to another job. He told me that there was an opening for a food server position, so I placed my name on the waitlist for that job.

15- Before beginning work as a food server, I had to sign a Voluntary Work Program agreement. I did not receive a job description with the position's list of duties, although I know that descriptions of the work for each position do exist.

16- I worked as a food server/food porter for approximately 4 months. I was assigned to the position of Food Server # 2, and as such I had to clean the

1 tables before each meal, distribute the food trays to the detainees in the  
 2 unit, and clean the tables and floors after each meal, three times per day. I  
 3 had to wake up every morning at 5:30 or 6:00 a.m. to work on the  
 4 morning shift. Food Server # 1 would go to the kitchen to collect the food  
 5 trays and bring them to the unit. As Food Server # 2, I had to put the  
 6 orange juice, tea and spoons on the trays and give them to the detainees.  
 7 There were around 85 detainees in my unit that I had to serve. After they  
 8 all finished eating, I had to clean the unit's tables and the floors. There  
 9 were 10 long picnic benches and 2 round tables for 6 people that I cleaned  
 10 during each meal, before and after the meal, as well as the floor area that  
 11 got dirty during the meal. This position required me to work for about one  
 12 hour three times per day for a total of three hours per day every day of the  
 13 week.

14 17- After I had been working as a food server for quite some time, another  
 15 detainee told me he thought I was doing additional work that was not  
 16 necessary according to the job description of a food server, but I had no  
 17 way of knowing that because I was not provided with a job description.

18 18- I quit my job as a food server after a GEO officer who was supervising  
 19 me treated me poorly and I did not want to have any more contact with  
 20 him.

21 19- I was transferred to Unit G3. Once I was there, I applied for work and  
 22 was assigned to clean the visiting area. The GEO security guards who  
 23 assigned me to this area gave me a tour of the area that I had to clean and  
 24 told me what to do. They told me that I had to clean the hallways, the  
 25 visiting areas and the bathrooms. I had to mop floors and pick up the trash  
 26 of the visiting area. I had to do this work every night at 8:00 p.m.

1 20- GEO gave us mops, buckets, brooms, gloves and garbage bags to do this  
2 work.

3 21- I did the job of cleaning the visiting areas for one and a half months. I  
4 decided to stop doing this work because it interfered with my religious  
5 activities. I am a leader in my unit's church and I lead religious services  
6 at 3:00 p.m. and 8:00 p.m. every day. I changed my schedule cleaning the  
7 visiting area to 7:00 p.m. so that I would be able to perform the religious  
8 service at 8:00 p.m. But one night, the GEO guards made me work late,  
9 so I missed the night service. That is why I decided to look for other job  
10 opportunities.

11 22- While I was between work assignments, the GEO security guards asked  
12 me if I was willing to wax and buff the floors of the visiting areas. I  
13 accepted this job, which also paid \$1 per day. I asked them if they could  
14 also give me a sandwich, but they told me they could not, that GEO was  
15 no longer able to give food in exchange for this job. I waxed and buffed  
16 the floors of the visiting area for 4 hours each day, for a total of four days.  
17 *[text crossed out and initialed "JLP"]*

18 23- The job of waxing and buffing was very strenuous and tiring. GEO did  
19 not provide us with masks and I felt very dizzy from inhaling the  
20 chemicals from the products we had to use to remove the old wax before  
21 applying the new wax.

22 24- In the past, I had waxed floors outside of the NWDC. I remember that I  
23 was paid \$900 for 8 hours of work waxing and buffing floors in a yoga  
24 studio. However, GEO only paid us \$1/ day for our work waxing and  
25 buffing floors.  
26

1 25- The next job I got was cleaning the floor on the dining area in my unit.

2 This work requires me to work every night after dinner, approximately  
3 from 6:30 to 7:00 p.m. I do it once per day.

4 26- In the past, I also applied to work in the kitchen because I heard that you  
5 could eat more and better food if you worked in the kitchen. The GEO  
6 guards explained that they could not hire me to work in the kitchen  
7 because last year I had knee surgery while I was detained at the NWDC  
8 and I have not yet fully recovered.

9 27- We work hard at the NWDC every day to keep it clean and working. We  
10 should be compensated fairly. \$1/ day is not a fair payment for what we  
11 contribute to the operation of the NWDC.

12 I certify under penalty of perjury under the laws of the United States and the  
13 State of Washington that the above is true and correct.

14  
15 Dated this 31<sup>st</sup> day of August of 2018 in Tacoma, Washington.  
16  
17

---

18 JESUS LOPEZ PAEZ  
19  
20  
21  
22  
23  
24  
25  
26